

MCKEE NELSON LLP
Scott E. Eckas (SE 7479)
Kevin J. Biron (KB 1030)
One Battery Park Plaza, 34th Floor
New York, New York 10004
Tel: (917) 777-4200
Fax: (917) 777-4299

Attorneys for plaintiff
Greenwich Capital Financial Products, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
GREENWICH CAPITAL FINANCIAL PRODUCTS,
INC.,

Case No.: 07-CV-6523 (PKC)

Plaintiff,

ECF Case

-against-

KAY-CO INVESTMENTS, INC. (D/B/A PRO30
FUNDING),

Defendant.

-----x

**PLAINTIFF GREENWICH CAPITAL FINANCIAL PRODUCTS, INC.’S RULE 55(A)
REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT KAY-CO
INVESTMENTS, INC. (D/B/A PRO30 FUNDING)**

Pursuant to Federal Rule of Civil Procedure 55(a), plaintiff Greenwich Capital Financial Products, Inc. (“Greenwich”) respectfully requests that the Clerk enter default against defendant Kay-Co Investments, Inc. (“Kay-Co”). As demonstrated in the Affidavit of Scott E. Eckas filed herewith, the Summons and Complaint in this action were properly served upon Kay-Co on July 20, 2007 by personal service on Gerry Morando, intake clerk at National Registered Agents, Inc., which is Kay-Co’s registered agent. The Affidavit of Service was filed with this Court on July 23, 2007. Pursuant to Fed. R. Civ. P. 12(a), Kay-Co was required to plead or

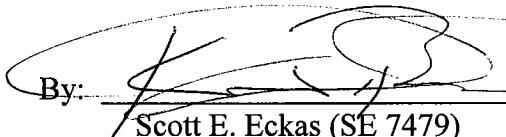
otherwise defend the claims asserted in the Complaint within twenty (20) days of service. However, no answer or other response was filed within that time, nor to the best of counsel's knowledge formed after reasonable inquiry, has one been filed to this day.

Accordingly, Greenwich respectfully requests that the Clerk note the default of Kay-Co upon the record.

Dated: New York, New York

Aug. 29, 2007

MCKEE NELSON LLP

By: 

Scott E. Eckas (SE 7479)
Kevin J. Biron (KB 1030)

One Battery Park Plaza
New York, New York 10004
Tel: (917) 777-4200
Fax: (917) 777-4299

*Attorneys for Plaintiff Greenwich Capital
Financial Products, Inc.*